

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: LISA GREEN-HARVEY, :** **CHAPTER 13**  
:  
**DEBTOR. :** **CASE No: 22-10756-AMC**

**OBJECTION TO PROOF OF CLAIM NO. 1**

Debtor Lisa Green-Harvey files the forgoing Objection to Proof of Claim no. 1 through her attorney, Michelle Lee of Dilworth Paxton LLP, and avers as follows:

1. Cavalry SPV I, LLC as assignee of HSBC bank Nevada, N.A. (“Lender”) filed Proof of Claim No. 1 for \$661.56. A copy of Proof of Claim No. 1 is attached as Exhibit “A”.
2. Debtor maintains that she has not paid this bill since 09/30/2010.
3. The proof of claim states that the charge-off date was 5/31/2011. Debtor filed her case on 03/28/2022.
4. More than four years have passed since the debt was last paid.
5. Moreover, Respondent’s documents speak for themselves.
6. Accordingly, the claim must be barred by the statute of limitations under 42 Pa. C.S.A. §5525.

WHEREFORE, Debtor respectfully requests that this Honorable Court disallow Proof of Claim No. 1 in its entirety.

Dated: 12/13/22

Respectfully Submitted,

/s/ Michelle Lee  
Michelle Lee, Esquire  
Dilworth Paxson LLP  
1500 Market Street  
Suite 3500E  
Philadelphia, PA 19102

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**CERTIFICATE OF SERVICE**

Michelle Lee, being duly sworn according to law, deposes and says that I served the Debtor's Objection to Proof of Claim no. 1 and notice thereof upon the following individuals listed below, by electronic means, email and/or first-class mail on 12/13/22:

KENNETH E. WEST,  
Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

Cheryl Gziczek  
Cavalry Portfolio Services, LLC  
PO Box 4252  
Greenwich, CT 06831-2200

Lisa Green-Harvey  
1219 68th Avenue  
Philadelphia, PA 19126

**ALL ATTORNEYS OF RECORD**  
**ALL PARTIES ON CLERK'S SERVICE LIST**  
**ALL CREDITORS AT THE ADDRESS LISTED ON THE MATRIX AND/OR at the ADDRESS LISTED ON FILED PROOFS OF CLAIMS**

And notice to be filed electronically with the Court, where it is available for viewing and downloading from the Court's ECF system, and that such electronic filing automatically generates a Notice of Electronic filing constituting service of the filed document upon all of the parties required by Federal Rule of Bankruptcy Procedure 3020(b)(1) and all parties that have requested service of papers in their case.

Respectfully Submitted,

/s/ Michelle Lee  
Michelle Lee, Esquire  
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## ORDER

**AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_ 2023**, upon consideration of the Debtor's Objection to Proof of Claim No. 1, and after notice and hearing, that the Objection to Proof of Claim shall be sustained and the claim is disallowed in its entirety.

**Honorable Judge Ashely M. Chan**

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**NOTICE OF OBJECTION TO PROOF OF CLAIM NO. 1**

Debtor Lisa Green-Harvey has filed an Objection with the Court. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in the bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

You or your attorney must attend the hearing scheduled to be held on **01/17/2022 11:00AM, via Telephonic Hearing.** If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated: 12/13/22

Respectfully Submitted,

/s/ Michelle Lee  
Michelle Lee, Esquire  
Dilworth Paxson LLP  
1500 Market Street  
Suite 3500E  
Philadelphia, PA 19102